

# **EXHIBIT A**

**VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND**

NSA AUTO TRANSPORT, LLC,

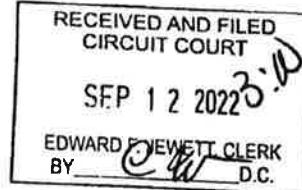
Plaintiff

v.

CONTRACT FREIGHTERS, INC.,  
Serve: Corporation Service Company, Registered  
Agent  
100 Shockoe Slip Fl 2  
Richmond, VA, 23219

Defendant

Case No.: CL22-3987(2)  
CL21002437-00



**COMPLAINT**

NSA Auto Transport, LLC (Plaintiff or NSA) states the following as its complaint against  
Defendant Contract Freighters, Inc. (Defendant or CFI):

1. Plaintiff is a domestic limited liability company that operates a long-haul trucking business.
2. Plaintiff owns tractor-trailers, trailers and other vehicles suitable for the operation of its long-haul trucking business.
3. Defendant is a foreign corporation authorized to do business and actually doing business in the Commonwealth of Virginia.
4. Defendant is also engaged in the long-haul trucking business and owns tractor-trailers, trailers and other vehicles suitable for the operation of its long-haul trucking business.
5. On June 4, 2022, a vehicle owned by Defendant and driven by an agent, servant and/or employee of Defendant struck a vehicle owned by Plaintiff.
6. At all times relevant to this Complaint, the driver of Defendant's vehicle was performing his duties as assigned by Defendant and was acting within the scope of his agency and/or

employment.

7. Defendant's driver operated Defendant's vehicle negligently and caused significant property damage to the vehicle owned by Plaintiff by colliding with Plaintiff's vehicle.

8. The negligence of Defendant's driver as described above was the sole proximate cause of the collision with Plaintiff's vehicle.

9. Defendant is responsible for the negligence of its agent servant and/or employee.

10. Defendant's negligence as described above is the sole proximate cause of significant damage to Plaintiff's vehicle, including costs to repair the vehicle, lost revenue and other related and consequential damages.

Wherefore, for the reasons stated above, Plaintiff prays for judgment against Defendant in the amount of \$500,000, its costs, interest as permitted by law and all other relief to which Plaintiff may be entitled.

**PLAINTIFF DEMANDS TRIAL BY JURY**



\_\_\_\_\_  
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